

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Local Number Portability Porting Interval	)	WC Docket No. 07-244
and Validation Requirements	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116

**REPLY COMMENTS OF COMCAST CORPORATION**

Comcast Corporation (“Comcast”) and its affiliates hereby submit these reply comments in response to the September 15, 2011 Public Notice released by the Commission in the above-captioned proceedings.<sup>1</sup>

**I. INTRODUCTION AND SUMMARY**

On June 20, 2011, the North American Numbering Council (“NANC”) submitted a report to the Commission on local number portability (“LNP”) Best Practice 67.<sup>2</sup> This best practice establishes “the minimum quantity of [telephone numbers] on a port request that can be considered a ‘project’ by the Old Service Provider for which the due date can be negotiated between the Old and New Service Providers and not necessarily [be] a candidate for the 4 business day non-simple porting interval.”<sup>3</sup> NANC’s best practice also establishes the minimum quantity of telephone numbers on a requested Customer Service Record (“CSR”) “for which the

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<sup>1</sup> *Comment Sought on North American Numbering Council Proposal for Standardized Minimum Thresholds and Intervals for Non-Simple Ports and “Projects,”* Public Notice, 26 FCC Rcd 13026 (2011) (DA 11-1558) (“Public Notice”).

<sup>2</sup> *LNPA WG Best Practices Document* (modified May 10, 2011), available at: <[http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0919/DOC-309681A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0919/DOC-309681A1.pdf)> (“Best Practice 67”), Attachment 2 to Letter from Betty Ann Kane, Chairman, North American Numbering Council, to Sharon Gillett, Chief, Wireline Competition Bureau (June 20, 2011), available at: <<http://transition.fcc.gov/wcb/cpd/Nanc/nanccorr.html>> (“NANC June 20 Letter”).

<sup>3</sup> Best Practice 67 at 2.

return of the CSR to the requesting New Service Provider can exceed 24 clock hours.”<sup>4</sup> As outlined below, Comcast supports Best Practice 67 because it is a reasonable solution to a current number porting issue and is the product of industry discussions that the Commission has encouraged.<sup>5</sup>

## **II. BEST PRACTICE 67 RESOLVES ONGOING AMBIGUITIES THAT HINDER THE PORTING PROCESS**

Comcast appreciates and supports the efforts of the NANC and the Local Number Portability Administration Working Group (“LNPA WG”) to reach consensus on what constitutes a “project” for purposes of processing porting requests.<sup>6</sup> Notably, Best Practice 67 eliminates a significant source of ambiguity and confusion within the industry. The Commission’s rules do not establish the maximum number of telephone numbers associated with a non-simple port that is subject to the four-business-day deadline. Consequently, as the LNPA WG notes, service providers currently have “different definitions and thresholds” for determining what constitutes a non-simple LNP port request that must be completed within four

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<sup>4</sup> *Id.*

<sup>5</sup> *Telephone Number Requirements for IP-Enabled Services Providers*, Report and Order, Declaratory Ruling, Order on Remand, and Notice of Proposed Rulemaking, 22 FCC Rcd 19531, ¶ 63 (2007) (urging the industry to engage in “industry discussion and [reach] consensus”).

<sup>6</sup> The Commission consistently has sought the views of industry groups such as NANC and the LNPA WG in order “to ensure consistency and to provide a national perspective on number portability issues.” *Telephone Number Portability*, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352, ¶ 93 (1996). *See also* Comments of AT&T, WC Docket No. 07-244, at 2 (Oct. 31, 2011) (noting that “[t]he Commission has consistently turned to industry bodies to develop standards and solutions for obtaining regulatory goals and mandates.”); *FCC Announces GSA’s Approval of the Renewal of the North American Numbering Council Charter Through September 23, 2013*, Public Notice, CC Docket No. 92-237, DA 11-1729 (rel. Oct. 18, 2011) (NANC “has provided the Commission with critically important recommendations,” including the “recommended porting intervals for simple, non-simple, and project ports”).

business days and one that is defined as a “project” that is subject to both a longer porting interval and a longer interval for the return of the CSR.<sup>7</sup>

Comcast agrees with CenturyLink that Best Practice 67 “successfully balances and resolves the competing interests in efficient, accurate, and timely processing of port requests.”<sup>8</sup> Specifically, Comcast supports the finding that the processing of non-simple port requests involving more than fifty telephone numbers, including the return of CSR information, is best handled as a “project” with specific porting intervals to be negotiated between the old and new network service providers. Moreover, Best Practice 67 sets forth reasonable criteria for the completion of these types of ports and provides carriers with an appropriate framework to manage expected porting completion dates.

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<sup>7</sup> Best Practice 67 at 1; *LNPA Working Group Status Report to NANC*, at 1 (May 17, 2011), available at: <[http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2011/db0919/DOC-309681A6.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2011/db0919/DOC-309681A6.pdf)>, Attachment 1 to NANC June 20 Letter.

<sup>8</sup> Comments of CenturyLink, WC Docket No. 07-244, at 2 (Oct. 31, 2011).

### III. CONCLUSION

For the foregoing reasons, Comcast supports “the thresholds and processing timelines for non-simple ports and projects” set forth in Best Practice 67.<sup>9</sup>

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<sup>9</sup> Public Notice at 2.